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August 5, 2021

**Via ECF**

Hon. Sarah Netburn, U.S.M.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

**Re:** Gutierrez et al v. 300 West 46th St. Corp. et al  
Case No: 1:18-cv-04239-SN

Your Honor:

This office represents Plaintiff in the above-referenced matter. We write to request permission to withdraw as attorneys for Plaintiff Lorenzo Antonio Bravo Bravo ("Plaintiff"), pursuant to Local Civil Rule 1.4.

This request is necessary because Plaintiff has failed to cooperate with the prosecution of this matter. Specifically, this office has been attempting to secure the Plaintiff's cooperation in the preparation of a default motion to no avail. This office has attempted to reach Plaintiff by phone, by text messages, has reached out to a contact that Plaintiff provided.

To date, despite our efforts, Plaintiff has not responded and indicated whether he intends to prosecute this action. Accordingly, we see no choice but to seek to withdraw as counsel for Plaintiff. We will not be asserting a charging or retaining lien. We are serving this application, both in English and Spanish, upon Plaintiff's last known home address and upon the Defendants.

If the Court requires any additional information for this application, we will provide it. We thank the court for its attention to this matter.

Respectfully Submitted,

/s/ Khalil Huey  
Khalil Huey Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
Attorneys for Plaintiff

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Cc: Via ECF

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